

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

**FILED<sup>3</sup>**

JUN 2 5 2004

Director of the Manufactured  
Housing and Modular Units Program  
of the Public Service Commission,

Missouri Public  
Service Commission

Complainant,

v.

Case No. MC-2004-0079

Amega Sales, Inc.,

Respondent.

**RESPONDENT'S FIRST INTERROGATORIES  
AND DATA REQUESTS TO COMPLAINANT**

COMES NOW Respondent Amega Sales, Inc., by and through its attorney, and pursuant to law propounds the following interrogatories and data requests to Complainant, to be answered fully, separately, and in writing, pursuant to law. In answering these interrogatories and data requests on behalf of Complainant, all information is to be divulged which is possessed or available to the Complainant as well as all information which is possessed by or available to Complainant's attorneys, investigators, agents, employees, or other persons employed by or acting on behalf of Complainant. Complainant is also reminded of his duty to supplement responses to these interrogatories and data requests (and is hereby requested to supplement his answers to these interrogatories and data requests) with information acquired after answering same.

**Definitions:** The following terms when used in these interrogatories, unless expressly otherwise indicated, are intended to mean:

1. "Document," "records," and "writing" means any written, recorded or graphic material, however produced or reproduced, including documents maintained in electronic format.
2. "Identify" when used in reference to a document, record, or other writing means to state the type of document, e.g., letter, memorandum, telegram, contract, agreement, deed of trust, check, statement, report, etc., its author, addressee, or some other means of identifying it, its date and its present location or custodian. If any such document was but is no longer in your possession or

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subject to your control, state what disposition was made of it and the general contents thereof. Where you are requested to "identify" a document, such request shall be considered as a request to attach a copy of such document to your answers to these interrogatories. "Identify" when used in reference to a person or entity means to state the full name of that person or entity, the present residence or business address, and the present telephone number of that person or entity.

3. The words "you" or "your" refer to the Director of the Manufactured Housing and Modular Units Program of the Public Service Commission, and also to any employee, agent, officer, attorney, inspector, staff member, or other person or persons employed by or acting on behalf of such officer.

4. The term "Amega" refers to Amega Sales, Inc.

5. The term "subject manufactured home" means the manufactured home described in paragraph 12 of your complaint in this case.

### **INTERROGATORIES AND DATA REQUESTS**

1. Please identify all documents which you used or to which you referred in answering or preparing answers to these interrogatories.

#### **ANSWER:**

Notice of Complaint, issued by Missouri Public Service Commission on August 6, 2003. The original is in the Commission's files. A copy has been served on Respondent. A copy is attached to these responses as Schedules 1-1 and 1-2.

Complaint against Respondent, together with Exhibits 1 through 6 thereto, filed for the Director of the Manufacturing Housing and Modular Units Program of the Public Service Commission by Bruce H. Bates, attorney for the Director on August 5, 2003. The original is in the Commission's files. A copy has been served on Respondent. A copy of the Complaint and Exhibits 1-6 is attached to these responses as Schedules 1-3 through 1-15.

Application for Manufactured Home or Modular Unit Certificate of Dealer Registration, filed by Amega Sales, Inc. on January 16, 2003. The Director retains the original of this document. A copy of the Application is attached to these responses as Schedule 1-9 through 1-10.

2003 Certificate of Dealer Registration issued to Respondent by the Director on January 24, 2003. The Director retains a copy of this Certificate. A copy of the Certificate is attached to these responses as Schedule 1-11.

19. Produce any and all correspondence (including electronic mail correspondence) between you and the Missouri Attorney General and between your attorneys and the Missouri Attorney General concerning the subject matter of this case.

**ANSWER:**

The documents that the Director sent to the Missouri Attorney General are the documents that are attached to these responses as Schedules 1-1 through 1-15.